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July 29, 2019

Diana Shepard, Executive Director
405 Capitol Street, Suite 402
Charleston, WV 25301

Dear Ms. Shepard:

Re: LEGISLATIVE RULE 24CSR2, OSTEOPATHIC PHYSICIAN ASSISTANTS

On behalf of the West Virginia Hospital Association and its 63 member hospitals and health systems, we respectfully submit this letter to provide public comments in response to the above referenced **Legislative Rule 24CSR2, Osteopathic Physician Assistants**.

§24-2-2. Definitions.

2.1.q. "Hospital"- The definition of "hospital" has been amended in this rule to add additional restrictions not found in the authorizing legislation. Additionally, the changes to this definition conflict with the definition of "hospital" in the authorizing legislation. We would recommend removing the additional language proposed to be added to the definition of "hospital" to avoid confusion and to maintain consistency between the rule and the statute.

If you have any questions or concerns, please contact me at (304) 353-9720.

Sincerely,

Brandon Hatfield
General Counsel